

1 David A. St. John, Esq.
2 **ST. JOHN LAW OFFICES**
3 309 South A Street
Oxnard CA 93030-5038
4 (805) 486-8000 / fax (805) 486-8855
dsj@law-pro.net
048746

5 Attorneys for Debtor

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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

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11 In re

CASE NO. 11-01817-PB11

12 ALICIA DWYER,

13 Debtor.

14 AMENDED APPLICATION BY DEBTOR TO
EMPLOY SECURE REALTY SOLUTIONS,
LLC; STATEMENT OF POSITION OF THE
15 UNITED STATES TRUSTEE;
SUPPLEMENTAL DECLARATIONS OF
GREG NAROG AND DAVID A. ST. JOHN IN
RESPONSE TO UNITED STATES
TRUSTEE'S STATEMENT OF POSITION

16 [11 U.S.C. § 327; Local Rules 2014-1]

17 [NO HEARING REQUIRED]

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19 TO THE HONORABLE PETER W. BOWIE, UNITED STATES CHIEF JUDGE, AND
20 ALL INTERESTED PARTIES:

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22 PLEASE TAKE NOTICE, Alicia Dwyer, debtor and debtor-in-possession, respectfully
represents that

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24 1. These proceedings were commenced by the filing of a Voluntary Petition under Chapter
11 of the Bankruptcy Code on February 2, 2011.

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26 2. No trustee has been appointed by the court an Applicant is the debtor-in-possession.

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3. Applicant desires to employ Secure Realty Solutions, LLC ("Agent"), Greg Narog,

28

Managing Partner and Kevin Narog, Managing partner, and Kevin Narog, Broker-Associate Keller

1 Williams Realty, to support the process of creating and compiling the data and advising as to
2 relevant financial calculations for Applicant's proposed Plan, including the fair adjusted Property
3 Price Valuations and adjusted Loan Terms on the Applicant's real property. The Agent has
4 experience in Real Estate Investment Properties and Finance Expertise with regards to Property
5 Valuation especially related to Secured Debt Structure and Value - for both Residential and
6 Commercial Property Workouts in the Southern California area.

7 4. The Agents will manage the process, assemble relevant pricing and market data and
8 advise Applicant in preparing a sustainable positive Return on Investment based upon a fair
9 Revalued Price and fair revised Secured Debt Terms in a form suitable for submission to each
10 Creditor and the Court for consideration. The Agent will complete and perform all necessary tasks
11 to revise the plan as necessary.

12 5. To the best of Applicant's knowledge, based upon by the declaration by Greg Narog,
13 Secure Realty Solutions, LLC, none of its agents and/or employees has any connection with the
14 Applicant, any insider to Applicant, or any past or present creditors of Applicants. The Agent is not
15 and was not an investment banker for any outstanding security of the Applicant.

16 6. The Agent has not been, within three (3) years before the date of the filing of the petition,
17 an investment banker for security of Applicant or for such an investment banker in connection with
18 the offer, sale, or issuance of a security to Applicant.

19 7. The Agent is not and has not been, within two (2) years before the date of the filing of
20 the petition, a director, officer or employee of Applicant or investment banker as classified in
21 subparagraphs (B) or (C) of Bankruptcy Code Section 101(14).

22 8. The Agent does not have an interest materially adverse to the interest of the estate or of
23 any class of creditors, or equity security holders, by reason of any direct or indirect relationship to
24 or in connection with or interest in Applicant or an investment banker as classified in subparagraphs
25 (B) or (C) of the Bankruptcy Code Section 101 (14), or for any other reason.

26 9. The Agent is not a creditor of Applicant for any non-bankruptcy related services.

27 10. The Agent has have not received any money at this time.

28 11. The employment of Secure Realty Solutions, LLC, includes any and all officers, agents,

1 employees or subcontractors of the firm.

2 12. It is in the best interest of the estate to retain Agent because the Agent has extensive
3 background in the price revaluation practices of loan servicers and lenders and can more efficiently
4 provide for the production of an acceptable Plan comprised of Price and Loan Terms plan
5 components than other professionals.

6 13. The Statement of Position from the United States Trustee is attached. Also attached is
7 the Supplemental Declaration of Greg Narog addressing the issues raised by the United States
8 Trustee.

9 WHEREFORE, Applicant prays that she be authorized to employ the Agent with the
10 compensation to be determined pursuant to the fee schedule set forth in the declaration of Greg
11 Narog attached hereto and incorporated herein by reference.

12 Dated: March 10, 2011

13 Respectfully submitted



14
15 Alicia Dwyer
16 Debtor and Debtor- in- Possession

17 DECLARATION OF GREG NAROG

18 I, Greg Narog, declare:

19 1. I am a principal in Secure Realty Solutions, LLC (the "Agent"), and hold a Masters in
20 Business Administration from the University of Southern California. A copy of my resume is
21 attached as Exhibit "A" hereto. I make this declaration in support of the foregoing application of
22 the Debtor-in-Possession to employ the Agent in her Chapter 11 case. Each of the matters set forth
23 below is stated of my own personal knowledge and if called as a witness, I could competently testify
24 to each of them.

25 2. To the best of my knowledge, neither I nor any other member of my firm have any
26 financial interest or connection with the debtor or creditors or any other party in interest in this
27 bankruptcy case.

28 3. Neither I nor my firm have any interest adverse to the estate or the debtor. Both the firm

1 and I are disinterested persons as the terms are defined in 11 U.S.C. § 101(13).

2 4. Neither the Agent nor any of its employees or agents are, or have been, within two (2)
3 years before the date of the filing of the petition a director, officer or employee of the Debtor as
4 specified in Subparagraph (B) or (C) of the Bankruptcy Code § 101(14).

5 5. The firm has received no retainer from any party. Neither I nor the firm is a holder of pre-
6 petition claims against the Debtor, nor does the firm have any connection with the Debtor or any
7 insider of the Debtor or related entities of the Debtor. The firm has no present expectation of
8 representing such related entities in the future.

9 6. We are willing to accept as compensation for our services the amounts as set forth in our
10 Fee Schedule attached hereto as Exhibit "B" upon approval of the Court.

11 7. The firm acknowledges that our fee is subject to Bankruptcy Court approval. We
12 understand that the Bankruptcy Court has the authority to reduce the rate payable or the overall fee
13 for equitable reasons.

14 I declare under penalty of perjury, under the laws of the State of California, that the
15 foregoing is true and correct to the best of my knowledge, information and belief.

16 Executed on March 10, 2011 at Oxnard, California.

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GREG NAROG

Agent:
Secure Realty Solutions, LLC

By 

GREG NAROG, principal

Case 11-01817-PB11 Filed 03/02/11 Doc 28 Pg. 5 of 8

Resume of Principals of Secure Realty Solutions, LLC

1. Process Management, Analysis for CH 11 Property & Loan Reports Compilation
 - a. Greg Narog and/or Kevin Narog
 - i. Secure Realty Solutions, LLC – Managing Partners
 1. 323 E. Matilija Street, Ste 110-156 Ojai, CA 93023
 2. California LLC, filed June 27, 2008
 3. EIN – 20-5858741
 4. Ph: 805-646-9824, 805-421-7505
 5. Fax: 805-256-6475
 6. Email: info@securerealtyolutions.com, Gregu@securerealtyolutions.com, knarog@sbcglobal.net
 - ii. Real Estate Investment, Referral Services, and Loan Workouts; Documents Processing for Commercial and Residential Properties (Secure Realty Solutions, LLC is not a "Short Sale Consultancy")
 1. Short Sale Loan Documents Processing (MARS Compliant)
 - a. References: Ojai Coldwell Banker Property Shoppe, Ojai Keller Williams Realty, Oak View RE/MAX
 2. Referral Service for Commercial Loan Workouts for Multifamily and other Commercial/Retail/Hospitality Real Estate
 - iii. Greg Narog
 1. Education
 - a. MBA University of Southern California 1994
 - i. Beta Gamma Sigma
 - b. Masters Degree Electrical Engineering – USC 1978
 - c. Bachelor's Degree Biology/minor Business – USC 1975
 - i. Magna Cum Laude, Phi Beta Kappa
 2. Professional (see more detail on LinkedIn – Greg Narog)
 - a. Senior Sales Management – Oval Ideas, Inc.-VP, Cayenne Software(merged Sterling Software 1999) – VP, Cadre Technologies-National Sales Manager
 - b. Consulting – KPMG/BearingPoint-Microsoft Global Acct Mgr, Cognition Partners-Consultant, Star Digital-Consultant
 3. Real Estate Investor/Broker – Skyline Prospecting 1980's- OwnerBroker(license currently inactive) – Wilshire Blvd, Los Angeles; General Partner – Misc Multi-Family Apartment Syndications in Hollywood, CA; Secure Realty Solutions, LLC, Managing Partner
 - b. Kevin Narog
 - i. Keller Williams Realty - Broker-Associate
 1. 109 North Blanche Ste Ste 102 Ojai CA 93023

- 2. California Brokers License ID 01844577
- 3. Phone: 805-421-7507
- 4. FAX - 888-789-1515
- ii. Real Estate Agent
 - 1. Certified Pre-foreclosure Specialist (Short Sale Processing)
 - a. References- Keller Williams Realty, Coldwell Banker - Ojai
 - 2. Registered BPO agent (Broker Price Opinions – residential)
 - 3. Registered BOV agent (Broker Opinion of Value – multifamily, commercial)
 - 4. Registered REO agent (Foreclosed Real Estate Owned Listing Agent)
 - 5. Member Multiple Listing Service
 - 6. Member California Association of Realtors – Realtor
 - 7. Registered Agent "Equator" Loss Mitigation Processing System
 - Bank of America, GMAC, others.
 - 8. California Broker Licensee
- iii. Education
 - 1. B.S. Real Estate – California State University Northridge – 2010
 - 2. B.A Finance – California State University Northridge – 2010
- iv. Professional
 - 1. Realtor – Keller Williams Realty, Ojai
 - 2. Facilities and Workplace Safety Compliance, Shipping – Behavioral Sciences & Technology Ojai CA,

The principals of Secure Realty Solutions, LLC have extensive relevant and recent experience in understanding the data and resources major lenders use in ascertaining price and in providing documentation necessary to reach agreement as to acceptable fair market valuation price of properties and relevant market financing issues.

Case 11-01817-PB11 Filed 03/02/11 Doc 28 Pg. 7 of 8

Exhibit "B"

1 MARY TESTERMAN DUVOISIN, ATTORNEY #163514
2 TRIAL ATTORNEY
3 OFFICE OF THE UNITED STATES TRUSTEE
4 402 WEST BROADWAY, SUITE 600
5 SAN DIEGO, CA 92101-8511
6 (619) 557-5013
7
8 Attorney for
9 TIFFANY L. CARROLL
10 ACTING UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT

Southern District of California

10 In re:) Case No. 11-01817-PB11
11 ALICIA D. DWYER,) STATEMENT OF POSITION
12 Debtor-in-Possession.) OF UNITED STATES TRUSTEE
13 Hearing Date: None
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15

The United States Trustee responds to the APPLICATION BY DEBTOR TO EMPLOY SECURE REALTY SOLUTIONS, LLC; DECLARATION OF GREG NAROG ("APPLICATION") as follows:

16 _____ The United States Trustee takes no position.

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18 _____ The United States Trustee has no objection.

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20 _____ The United States Trustee objects and requests a hearing.

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22 XX _____ The United States Trustee objects as set forth below.

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1 The Office of the United States Trustee (“UST”) is responding to the Debtor’s
2 Application to employ Secure Realty Solutions, LLC (“Secure Realty”), which was filed with the
3 Court on February 22, 2011. The UST has the following objections to the Application:

4 **Procedural Issues**

5 LBR 9034(b) sets forth the procedures for an applicant to receive a statement of
6 position from the UST. The UST also has guidelines and requirements posted at
7 <http://www.usdoj.gov/ust/r15/forms.htm> that detail procedures to obtain a statement of position.
8 In this instance, the Debtor did not request a statement of position from the UST prior to filing
9 the Application with the Court.

10 **Proposed Order**

11 Local Bankruptcy Rules 2014-1(a) and 9034 require the submission of a proposed order
12 with the employment application. The Application that is filed with the Court should include a
13 proposed order which provides that no fees or costs will be paid to the firm without prior
14 authorization from the Court.

15 **Services and Fee schedules**

16 The movant, or one seeking employment, has the burden of proof to establish the
17 reasonableness of the proposed terms and conditions of employment. *In re Gillett Holdings, Inc.*,
18 137 B.R. 452, 455 (Bankr.D.Colo. 1991). In addition, Rule 2014 requires that the Application
19 state “the specified facts showing the necessity for the employment.”

20 The Application offers that Secure Realty will support the “process of creating and
21 compiling data and advising as to relevant financial calculations for Applicant’s proposed Plan,
22 including the fair adjusted Property Price Valuations and adjusted Loan Terms on the Applicant’s
23 real property”, and the Agent will “complete and perform all necessary tasks to revise the plan as
24 necessary”. The debtor is to pay the firm, which includes all of it’s officers, agents, employees
25 or subcontractors at rates presented in Exhibit B to the Application. Exhibit B proposes hourly
26 rates for management, consultation, analysis, and report compilation at \$250 and \$350 for
27 partners and \$175 to \$300 for independent consultants; \$50 to \$225 per hour for analytic tasks,

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1 and for administrative tasks, \$20 to \$125 per hour. Exhibit B also provides flat fees for appraisals
2 and title reports.

3 The explanation regarding services and the fee structure provided by Secure Realty does
4 not support a clear understanding of the services Secure Realty will provide to the Debtor, and it
5 is unclear if the Secure Realty has the knowledge to complete the Debtor's proposed plan and to
6 revised the plan as necessary. In addition, the UST is also unclear how services provided by
7 Secure Realty would not duplicate services typically provided by general counsel. The
8 Application should be amended to clarify the specific services to be provided to the Debtor.

9 WHEREFORE the Office of the United States Trustee respectfully objects to the
10 Application by Debtor to Employ Secure Realty Solutions, LLC; Declaration of Greg Narog.

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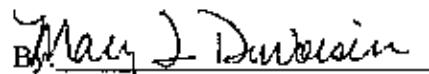
Respectfully submitted,

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TIFFANY L. CARROLL
ACTING UNITED STATES TRUSTEE

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15 Dated: March 3, 2011

By: 
Mary Testerman DuVoisin,
Attorney for the Acting United
States Trustee

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048746

5 Attorneys for Plaintiff ALICIA D. DWYER

6

7

8 **UNITED STATES BANKRUPTCY COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10

11 **In re:**

12 **ALICIA D. DWYER**

13 **Debtor,**

14 **Chapter: 11**

15 **Case No. 11-01817-PB-11**

16 **SUPPLEMENTAL DECLARATION OF**
17 **GREG NAROG IN RESPONSE TO**
18 **UNITED STATES TRUSTEE'S**
19 **STATEMENT OF POSITION**

20 **[Local Rule 2014-1]**

21 I, Greg Narog, declare:

22 1. I am a principal of Secure Realty Solutions, LLC ("SRS"). I make this
23 Supplemental Declaration in response to the issues raised by the United States Trustee
24 in the Statement of Position to the Application of Debtor to Employ SRS as a real estate
25 valuation and interest rate expert. I have personal knowledge of the facts stated herein
26 and, if called as a witness, I could and would competently testify thereto.

27 2. **Specific Services and Estimated Cost**

28 The bankruptcy estate consists of six rental/investment properties in San Diego and
Ventura Counties. In support of Debtor's case, we will obtain Broker Price Opinions,
including exterior and interior inspections and verified rental rate comparables and trends,

1 for a total out-of-pocket cost of approximately \$1,505.00 for the six properties, as follows:

2	A.	Mississippi (SFR - foundation issues)	\$ 300.00
3	B.	San Clemente (Fourplex)	270.00
4	C.	S Santa Rosa (Triplex)	245.00
5	D.	S Catalina (SFR - verify repairs)	235.00
6	E.	Utah (Duplex (SFR - verify repairs)	260.00
7	F.	Church St (SFR)	<u>200.00</u>
8			\$1,505.00

9 A detailed breakdown of cost per property is attached hereto.

10 Cross checking data, and establishing Fair Value and Fair Terms Offers to the
 11 creditor side is estimated to take 1 - 1.5 hours each, or \$350 -\$500 in SRS fees per
 12 property. Additional services may include reviewing and responding to values and rates
 13 proposed by creditor/servicers if significantly different from Debtor's initial Fair Value and
 14 Fair Terms Offers.

15 3. The Contribution of SRS to the Estate.

16 SRS will provide general counsel with a Fair Value and Fair Terms opinion using
 17 methods, resources and language familiar to the real estate finance industry for use in
 18 preparing Debtor's proposed Chapter 11 cram down plan, hopefully, with consensus from
 19 the creditor side, or with significantly narrowed issues. It is anticipated that the total time
 20 and cost in using an industry based approach to Fair Value and Fair Terms should be
 21 significantly less than a prolonged evidentiary battle of forensic experts in court.

22 Three Key Benefits of SRS:

- 23 A) Cost: Reduced cost in developing and validating real estate and finance
 valuations and addressing creditor responses.
- 24 B) Accuracy and Fairness: Accuracy, clarity and fairness of the initial
 proposal and final result for both sides.
- 25 C) Time: Each property in a portfolio is a unique structure in a unique

1 location. In addition, each different lender/servicer will have varying
2 evaluation protocols. Our experience in dealing with multiple lenders should
3 help expedite a fair result.

4 I declare under penalty of perjury, under the laws of the United States of America
5 that the foregoing is true and correct.

6 Executed on March 12, 2011, at Oxnard, California.

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8 GREG NAROG
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Alicia Dwyer - Properties Valuation – reference data for Greg Narog Supplemental

Since these are investment/rental properties... comparison of the collected rental rates is a factor of the comparable valuation of these properties versus other similar properties... so will include this data to the interpretation of the value derived from the standard structure/land-centric valuation.

Property	Type	No Units	BPO Price	Repair Line Item Details - Estimates	Rental Rates Comparables	AVM and Title	Total
Mississippi	House	2	\$150	Foundation needs Engr Inspection \$80 Incl this data in BPO estimate	\$50	\$15	\$215
San Clemente	Fourplex	4	200	n/a	\$0	15	265
S Santa Rosa	Triplex	3	175	n/a	\$0	15	265
S Catalina	House	1	125	Flooring, Kitchen, Roof, Sidewalk etc \$40	\$0	15	130
Utah	Duplex	2	150	Footings Engr Rept, Plumbing \$40	\$0	15	235
Church St	House	1	125	n/a	\$0	15	190
							\$1605

Also:

LPS – Full AVM for each property \$ 15.00 per property
 Title Report – find other liens ? County Inspection agencies issues ? \$ 5.00 per property

Based upon Client's property description reports... verification and validation is needed:

- ✓ Mississippi - requires Foundation Inspection - per client ... Inspection & Estimate \$ 80
- ✓ S Catalina property - validation of List of Repairs needed LINE ITEMS on BPO \$ 40
- ✓ Utah Property - validation of Foundation Repair Quotation LINE ITEMS on BPO \$ 40

Total Estimated Cost of Inspections and Misc Valuation Reports \$ 1505.00 Dollars

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048746

5 Attorneys for Plaintiff ALICIA D. DWYER

6

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

10 In re:

11 ALICIA D. DWYER

12 Debtor,

Chapter: 11

Case No. 11-01817-PB-11

SUPPLEMENTAL DECLARATION OF
DAVID A. ST. JOHN IN RESPONSE TO
UNITED STATES TRUSTEE'S
STATEMENT OF POSITION

[Local Rule 2014-1]

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18 I, David A. St. John, declare:

19 1. I am the Attorney for this Chapter 11 Debtor. I make this Supplemental
20 Declaration in response to the issues raised by the United States Trustee in the Statement
21 of Position to the Application of Debtor to Employ Secure Realty Solutions, LLC (SRS). I
22 have personal knowledge of the facts stated herein and, if called as a witness, I could and
23 would competently testify thereto.

24 2. The principals of SRS are unwilling to advance out-of-pocket costs in obtaining
25 the valuation data for investment properties in the estate. The estate is maintaining
26 separate DIP accounts for each property, and there are sufficient funds in each account for
27 such costs, which are reasonable, and necessary to support preparation of debtor's plan,
28 as follows:

Supplemental Declaration of David A. St. John

1	A. Mississippi (SFR - foundation issues)	\$ 300.00
2	B. San Clemente (Fourplex)	270.00
3	C. S Santa Rosa (Triplex)	245.00
4	D. S Catalina (SFR - verify repairs)	235.00
5	E. Utah (Duplex (SFR - verify repairs)	260.00
6	F. Church St (SFR)	<u>200.00</u>
7		\$1,505.00

8 3. Debtor hereby requests Court authorization pay SRS the foregoing out-of-pocket
9 costs.

10 I declare under penalty of perjury, under the laws of the United States of America
11 that the foregoing is true and correct.

12 Executed on March 15, 2011, at Oxnard, California.


DAVID A. ST. JOHN

CSD 1001A [11/15/04]

Name, Address, Telephone No. & I.D. No.

David A. St. John

ST JOHN LAW OFFICES

309 South A Street

Oxnard CA 93030-5804

(805) 486-8000\048746

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West "F" Street, San Diego, California 92101-6991

In Re

ALICIA D. DWYER,

Debtor,

BANKRUPTCY NO. 11-01817-PB11

Date of Hearing:

Time of Hearing:

Name of Judge: Peter W. Bowie

ORDER GRANTING APPLICATION BY DEBTOR TO EMPLOY AGENT

IT IS ORDERED THAT the relief sought as set forth on the continuation pages attached and numbered 2 through 2 with exhibits, if any, for a total of 2 pages, is granted. Motion/Application Docket Entry No. ,

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DATED:

Judge, United States Bankruptcy Court

Signature by the attorney constitutes a certification under Fed. R. of Bankr. P. 9011 that the relief in the order is the relief granted by the court.

Submitted by:

ST JOHN LAW OFFICES

(Firm name)

By:/s/ David A. St. John
Attorney for Debtor

This matter came on for review before the above-entitled Court, Department Four thereof, the Honorable Peter W. Bowie, Judge Presiding, upon the Application of the Debtor, Alicia D. Dwyer, for an Order to Employ Secure Realty Solutions, LLC.

Upon review of the Application and good cause appearing;

IT IS HEREBY ORDERED that

Debtor, Alicia D. Dwyer, is authorized to employ Secure Realty Solutions, LLC for valuation and interest rate opinion as to Debtor's investment properties on the terms set forth in the application.

Debtor is hereby authorized to pay Secure Realty Solutions, LLC, out-of-pocket costs allocated to the respective property accounts, as follows:

A. Mississippi	\$300.00
B. San Clemente	270.00
C. S Santa Rosa	245.00
D. S Catalina	235.00
E. Utah	260.00
F. Church St	<u>200.00</u>
	\$1,505.00

No fees or further costs shall be paid to Secure Realty Solutions, LLC, without prior authorization from the Court.

CSD 3010 [04/28/96]

Name, Address, Telephone No. & I.D. No.

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 ST JOHN LAW OFFICES
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 (805) 486-8000
 048746

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West "F" Street, San Diego, California 92101-6991

In Re

Alicia D. Dwyer,

Debtor.

BANKRUPTCY NO. 11-01817-PB-11

Plaintiffs,

Defendants(s)

PROOF OF SERVICE

I, Nenen Obrador, certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made. I further certify that I served a copy of the following documents [describe each document served]: AMENDED EX PARTE APPLICATION TO EMPLOY AGENT, SUPPLEMENTAL DECLARATIONS OF GREG NAROG AND DAVID A. ST. JOHN, and [Proposed] ORDER, on March 17, 2011, by:

By E-MAIL to: ustp.region15sop@usdoj.gov (Office of the United States Trustee)

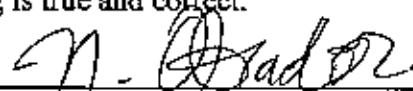
Personal Service - By leaving the documents with the following named person(s) or an officer or agent of the person(s) at:

Residence Service - By leaving the documents with the following adult at:

Under penalty of perjury, I declare that the foregoing is true and correct.

March 17, 2011

[Date]



[Signature]

Print Name	Nenen Obrador
Business Address	309 South A Street
City, State, ZIP	Oxnard CA 93030-5804